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ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

ILLINOIS
COMMERCE COMMISSION

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Illinois Commerce Commission
On Its Own Motion

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CHIEF CLERK'S OFFICE

Docket No. 03-0767

Investigation into the proper allocation of
line extension and service of installation costs

**PETITION TO INTERVENE OF LOCAL UNIONS 15, 51, AND 702 OF THE
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO**

Pursuant to 83 Ill. Admin. Code 200.200, Local Unions 15, 51, and 702 of the International Brotherhood of Electrical Workers, AFL-CIO (hereinafter referred to as "IBEW Locals 15, 51, and 702"), by their attorneys, petition the Illinois Commerce Commission to intervene in the above-captioned proceeding. In support of their Petition, Locals 15, 51, and 702, IBEW state:

1. Local Union 15, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 15"), whose main office is located in Naperville, Illinois, is a labor union and the collective bargaining representative of employees employed by Commonwealth Edison ("ComEd"), Exelon Business Services Company, Exelon Generation Company, Dominion Energy Services Company, Inc., and Midwest Generation EME, LLC. IBEW Local 15 has current collective bargaining agreements with these public utilities and power generating companies covering wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

2. Local 51, International Brotherhood of Electrical Workers, AFL-CIO ("Local 51, IBEW"), whose main office is located in Springfield, Illinois, is a labor union and the collective bargaining representative of employees employed by Ameren IP (f/k/a Illinois Power Company),

Ameren CILCO (f/k/a Central Illinois Light Company), Dynegy Midwest Generation, and Exelon Generation (f/k/a AmerGen Energy Company). IBEW Local 51 has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

3. Local 702, International Brotherhood of Electrical Workers, AFI-CIO ("Local 702, IBEW"), whose main office is located in West Frankfort, Illinois is a labor union and the collective bargaining representative of employees employed by Ameren IP (f/k/a Illinois Power Company), Ameren CIPS (f/k/a Central Illinois Public Service Company), and Ameren Energy Generating Company (also f/k/a Central Illinois Public Service Company). IBEW Local 702 has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

4. The bargaining unit employees represented by IBEW Locals 15, 51, and 702 at the above public utilities and power generating companies, as their names indicate, are engaged in the generation, transmission and distribution of electric power to industrial, commercial, and residential customers in the State of Illinois.

5. The bargaining unit employees represented by IBEW Locals 15, 51, and 702 at the above public utilities and power generating companies perform the electrical line extensions and service installations covered by Code Part 410 of the Commission's rules. The Commission initiated this proceeding in part for the purpose of investigating the need to amend Code Part 410 of its rules.

6. IBEW Locals 15, 51, and 702 and its members have a direct and material interest in and may be affected by the outcome of this Commission proceeding as it relates to any contemplated changes to or clarifying interpretations of Code Part 410. IBEW Locals 15, 51, and 702 and their members also have a direct and material interest in and may be affected by the “settlement agreements” between the Home Builders Association of Illinois and ComEd and its affiliates, and the Ameren companies, which have been filed in this proceeding. Finally, IBEW Locals 15, 51, and 702 and their members at the above public utilities and power generating companies have a direct and material interest in and may be affected by the “Joint Parties Agreement” between the Staff of the Illinois Commerce Commission and the Joint Parties,¹ which has also been filed in this proceeding.

7. The interests of IBEW Locals 15, 51, and 702 and its members are not adequately represented by any other party to this proceeding.

8. IBEW Locals 15, 51, and 702 have the legal authority to intervene on behalf of its members and represent their interests in this Commission proceeding. See WPS Energy Service, Inc., Docket No. 00-0199, Order Reopening Proceeding (March 16, 2001).

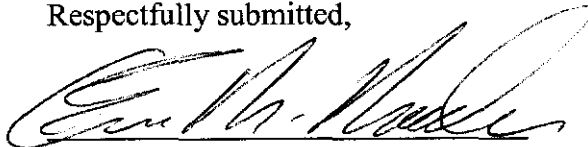
¹ Aside from Commission Staff, the following companies are parties to the “Joint Parties Agreement”: AmerenUE; AmerenCILCO; AmerenCIPS; Interstate Power and Light Company; South Beloit Water Gas and Electric Company; AmerenIP; ComEd; Peoples Gas Light and Coke Company; North Shore Gas Company; and Northern Illinois Gas Company d/b/a Nicor Gas.

9. IBEW Locals 15, 51, and 702 seek to intervene and be treated as parties in the proceeding and will accept service by electronic means as provided for in 83 Ill. Admin. Code Section 200.200(a). IBEW Locals 15, 51, and 702 request that the following information be added to the service list:

Eric M. Madiar
Freeborn & Peters LLP
217 East Monroe Street, Suite 202
Springfield, IL 62701
(217) 535-1060
(217) 535-1069 (fax)
E-mail: emadiar@freebornpeters.com

WHEREFORE, IBEW Locals 15, 51, and 702 respectfully petition the Illinois Commerce Commission for leave to intervene and be treated as parties in the above-captioned proceeding and to pursue the points made in this Petition to Intervene before the Commission.

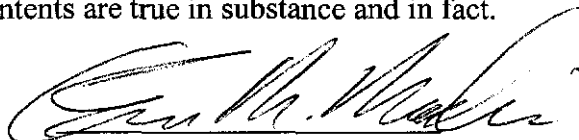
Respectfully submitted,



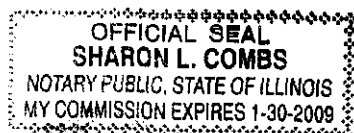
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VERIFICATION

I, Eric M. Madiar, first being duly sworn upon my oath, depose, and state that I am one of the attorneys for Local Unions 15, 51, and 702 International Brotherhood of Electrical Workers, that I have read the above and foregoing Petition to Intervene by me situated and know the contents thereof; and that said contents are true in substance and in fact.



Subscribed and sworn before me this 19th day of August, 2005.




Notary Public

STATE OF ILLINOIS

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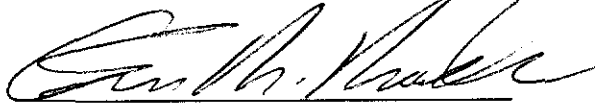
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NOTICE OF FILING

Please take notice that on August 19, 2005, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission, Elizabeth Rolando, 527 East Capitol Avenue, Springfield, IL 62701 the enclosed Petition to Intervene of Local Unions 15, 51, and 702 of the International Brotherhood of Electrical Workers, AFL-CIO in the above-captioned proceeding.



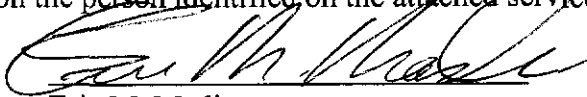
Eric M. Madiar

Attorney for Local Unions 15, 51, and 702

International Brotherhood of Electrical Workers, AFL-CIO

CERTIFICATE OF SERVICE

Please take note that on August 19, 2005, I, Eric M. Madiar, hereby certify that I did file with the Illinois Commerce Commission the foregoing Petition for Leave to Intervene and electronically served the same upon the person identified on the attached service list.



Eric M. Madiar

Attorney for Local Unions 15, 51, and 702

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